

REMARKS

This is in response to the Office Action dated December 27, 2004. Claim 19 has been canceled. Thus, claims 1-18 and 20 are now pending.

The applicant notes with appreciation the Examiner's indication that claims 4-6 and 19 contain allowable subject matter. Allowable claim 19 has essentially been added to claim 16, and most subject matter from allowable claim 4 has been added to claim 15. Thus, it is respectfully submitted that claims 15-18 and 20 are now in condition for allowance given the Examiner's indication of allowable subject matter.

The drawings stand objected to for including text. This drawing objection is respectfully traversed. There is no rule against using text in the drawings of a patent application or patent. To the contrary, many arts such as electrical arts require text in the drawings to label features or elements. The text in the figures makes them more clear and easy to understand. Thus, it is respectfully requested that the drawing objection be withdrawn.

Claim 1 stands rejected under 35 U.S.C. Section 103(a) as being allegedly unpatentable over Pharmakidis in view of Munson. This Section 103(a) rejection is respectfully traversed for at least the following reasons.

Claim 1 requires "subsequent to attaching the blanket of insulation to the wall between the first and second supports, attaching a flexible vapor retarder sheet to the protruding portion of each of the first and second supports so that the flexible vapor retarder sheet covers the blanket of insulation which is located in a cavity defined at least partially between the wall and the flexible vapor retarder sheet." For example and without limitation, Fig. 4 of the instant application illustrates, subsequent to attaching the blanket of insulation 7 to the wall 1 between the first and second supports 3, attaching a flexible vapor retarder sheet 11 to the protruding

portion of each of the first and second supports 3 so that the flexible vapor retarder sheet 11 covers the blanket of insulation 7 which is located in a cavity defined at least partially between the wall 1 and the flexible vapor retarder sheet 11. The cited art fails to disclose or suggest the aforesaid underlined aspects of claim 1.

Pharmakidis discloses a heat retention wall system including insulation 14 and membrane 18. However, in contrast with claim 1, membrane 18 in Pharmakidis is not attached to any protruding portion of any support. For instance, supports 50, 52 in Pharmakidis have no protruding portions, and furthermore membrane 18 thus cannot be attached to any protruding portion thereof. Thus, the base reference to Pharmakidis is entirely unrelated to the invention of claim 1 in these respects.

Furthermore, Munson teaches the opposite of what claim 1 requires – thereby teaching away from the invention of claim 1. In particular, claim 1 requires ""subsequent to attaching the blanket of insulation to the wall between the first and second supports, attaching a flexible vapor retarder sheet to the protruding portion of each of the first and second supports." In direct contrast to claim 1, Munson relates to a system where membrane 22 is attached to studs *before* the insulation is blown into the cavity – the opposite of what claim 1 requires. Munson cannot function in any other way. Thus, even if the insulation blowing system of Munson was used in Pharmakidis (which would be incorrect in any event, due to a lack of suggestion in the art), the invention of claim 1 still would not be met. Accordingly, the invention of claim 1 cannot be met by the cited art.

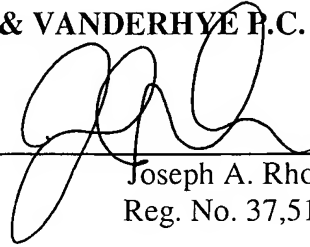
It is respectfully requested that all rejections be withdrawn. All claims are in condition for allowance. If any minor matter remains to be resolved, the Examiner is invited to telephone the undersigned with regard to the same.

ROMES et al..
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Respectfully submitted,

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